# UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

United States District Court Southern District of Texes FILED

JUL 1 9 2010

David J. Bradley, Clark of Court

UNITED STATES OF AMERICA, Plaintiff,

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CIVIL ACTION NO. 4:10-cv-02022

\$22,456.00 IN U.S. CURRENCY, AND 2,500 IN EUROS, Defendant in rem.

## VERIFIED CLAIM TO DEFENDANT PROPERTY

- 1. COME NOW, RODRIGO GONZALEZ VELANDIA and ROSEMARY MORALES of Bogota, Capital District, Republic of Colombia.
- 2. Mr. Gonzalez and Ms. Morales, husband and wife, lay equal claim to all of the \$22,456.00 and €2,500.00 named as defendant *in rem* to this action.
- 3. Mr. Gonzalez and Ms. Morales assert an interest of superior title to this money. Approximately:
  - a. \$5,300.00 was earned through their formalwear and bridal boutiques in Colombia;
  - b. \$5,500.00 was bailed to Mr. Gonzalez by his sister in Bogota, Magaly Gonzalez, for delivery to her husband in China, German Buitrago Mejia; and
  - c. \$15,000.00 was borrowed from Mr. Gonzalez's mother, Miryam Velandia de Gonzalez.

The money, save the bailed amount, was to be used in China for business and personal expenses at Expo 2010, in Shanghai, and at the 107th Chinese Import and Export Fair (Canton Fair), in Guangzhou.

Respectfully Submitted,

Nelson of aurico Ocampo

Nelson Mauricio Ocampo, Attorney-in-Charge Texas Bar Number 24072263 Admitted to SDTX *Pro Hac Vice* P.O. Box 218149 Houston, TX 77218-8149 T/F (281) 738-3023

Email: nelson@optimolegal.com

#### **VERIFICATION**

### We, RODRIGO GONZALEZ VELANDIA and ROSEMARY

MORALES, declare under penalty of perjury as provided by 28 U.S.C. §1746 that we have read and understand this Verified Claim to Defendant Property, and the facts stated in this claim are true and correct to the best of our knowledge and belief.

Rodrigo Gonzalez Velandia

Colombian Identification, Cedula de Colombia: 79470208

Notarized:

ANTE LA NOTARIA SETENTA Y SIETE DEL CIRCULÓ DE BOGOTA, D.C.

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Expedida en y declaró que la firma que apurece en Expresente documento es suya

el declarant<del>e</del>

Bogotá. D.C. de de Autorizo el anterior documento

LUZ MERY CAST TO MARULANDA

Rosemary Morales

Colombian Identification, Cedula de Colombia: 51976741

ANTE LA NOTARIA SETENTA Y SIETE DEL CIRCULO

DE BOGOTA, D.C.

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el declarante os de 20

Bogotá, D.C. de de 20

Autorizo el anterior documento

15 JUL 2010

LUZ MEBUCASSAÑO MARIHANDA MARIHANDA

# **CERTIFICATE OF SERVICE**

I hereby certify that on July 19, 2010, I caused an exact copy of the attached Verified Claim to Defendant Property to be delivered to Albert Ratliff, Assistant United States Attorney, at P.O. Box 61129, Houston, TX 77208-1129, through certified mail article number 7003 2260 0007 1486 2642, return receipt requested.

> Nelson Mauricio Ocanpo Nelson Mauricio Ocampo

Attorney-in-charge

Texas Bar Number 24072263

Admitted to SDTX Pro Hac Vice

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